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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DALLIN VON HILL,

Defendant.

**STIPULATED MOTION TO CONTINUE
JURY TRIAL**

Criminal Action No. 2:24-CR-00299-HCN-1

Judge Howard C. Nielsen, Jr
Magistrate Judge Jared C. Bennett

DALLIN VON HILL, through undersigned counsel, respectfully moves to continue his jury trial for 120 days and exclude time under the Speedy Trial Act. Counsel for the United States stipulates to the motion, which is made in accordance with 18 U.S.C. § 3161.

FACTUAL BACKGROUND

1. On September 20, 2024, Mr. Hill appeared for an initial appearance/arraignment on two-count indictment charging Coercion or Enticement of Female/Male - Coercion and Enticement for Illegal Sexual Activity, in violation of 18:2422(b); and Activities re Material Constituting/Containing Child Porno - Receipt of Child Pornography in violation of 18:2252A(a)(2) and (b).

2. The Court arraigned Mr. Hill and scheduled trial for November 26, 2024, which was within the time allowed under the Speedy Trial Act. Trial was reset on April 1, 2025.

ARGUMENT

3. Mr. Hill moves to continue under 18 U.S.C. § 3161(h)(7). This is the second request to continue trial. The time requested is reasonable and excludable under the Speedy Trial Act. Mr. Hill is currently held in custody.
4. In this case, the Defense is seeking an evaluation for Mr. Hill and would like more time to allow the receipt and review of evaluation, and Mr. Hill is currently in sex offender treatment and is steadily progressing. Counsel would like these two issues to be completed before discussing a possible resolution with the United States.
5. Mr. Hill is entitled to effective assistance of counsel in all of these respects, including during plea negotiations, see *Missouri v. Frye*, 566 U.S. 134 (2012). Even taking into account the exercise of due diligence, under the circumstances, failure to grant a continuance would result in a miscarriage of justice and would deny Mr. Hill the reasonable time necessary for effective preparation of his defense.
6. Counsel for the United States was contacted and has joined in this proposed continuance.

CONCLUSION

For these reasons, Mr. Hill moves to continue trial for 120 days. The ends of justice served by granting the continuance outweigh the interests of the public and the defendant in a trial as currently set; therefore, the time requested is excludable under 18 U.S.C. § 3161(h)(7).

DATED this 13th day of March, 2025.

/s/ Carol A. Dain
US ATTORNEY'S OFFICE
Carol A. Dain
Attorney for Plaintiff
Signed Electronically with Permission

/s/ Adam L Crayk
STOWELL CRAYK, PLLC
Adam L. Crayk
S. Todd Banks
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of March, 2025, I electronically filed the foregoing **STIPULATED MOTION TO CONTINUE JURY TRIAL** with the clerk of the Court and opposing counsel using the ECF System.

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s/ Myrleen Wright